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1. The following is a recommended change to NPRM-2002-11666: — 44

A. 61.3(a) - Combine a picture ID with the Flight Certificate, instead of using any other source of ID. Driver licenses rarely contain any security features. They are also not standard in The U.S. Every state has different designs and production techniques. Passports are harder to forge and use special embedded security features. Most of them meet ICAO Standards and are produced at regional printing centers under strict quality control. It would be clever to introduce a special kind of passport, one which would combine the Flight Certificate and Passport into one. Passports feature standardization within each series, they are also easily detected with equipment like Imagin

Automation's "IA-thenticate" platform. Since most pilots already have a valid passport that they carry with them at all times, this would make it ideal for them. This would increase security and Safety.

2. I appreciate your time and the opportunity to participate in the rule-making process. I will be happy to answer any questions you might have in regard to my recommendation.

Yours truly,

Raymond Gradali,